

FILED

UNITED STATES DISTRICT COURT  
DISTRICT OF WYOMING



3:39 pm, 3/24/25

UNITED STATES OF AMERICA,

Plaintiff,

v.

**YONAIKER ALEXANDER FERNANDEZ  
PEDRON, and YOHANDRI RAMO RAMIREZ  
GONZALEZ,**

Defendants.

**Margaret Botkins  
Clerk of Court**

## CRIMINAL COMPLAINT

Case Number: L:25-mj-00033-ABJ

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

From on or about March 15, 2025 through and including March 16, 2025, in the District of Wyoming, the Defendants, **YONAIKER ALEXANDER FERNANDEZ PEDRON** and **YOHANDRI RAMO RAMIREZ GONZALEZ**, each aiding and abetting the other, did knowingly receive and possess over \$1,000.00 in United States currency that had been taken and stolen from the care, custody, control, management, and possession of Big Horn Federal Savings Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation (FDIC), knowing said currency had been stolen.

In violation of 18 U.S.C. §§ 2113(c) and 2.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts: *(See attached Sworn Statement)*

Continued on the attached sheet and made a part hereof.

Signature of Complainant

ADRIANNE CULVER

Sworn to before me and subscribed via telephone,

March 24, 2025

Date

at

Mammoth, Wyoming

City and State



HON. STEPHANIE HAMBRICK

United States Magistrate Judge

Name &amp; Title of Judicial Officer

Signature of Judicial Officer

**AFFIDAVIT OF FBI SPECIAL AGENT ADRIANNE CULVER  
IN SUPPORT OF A CRIMINAL COMPLAINT**

I, FBI SA Adrienne N. Culver (“Affiant”), being duly sworn, state as follows:

1. Your Affiant has been employed as a Special Agent of the FBI since July 2015 and is currently assigned to the Lander Resident Agency of the Denver Division of the FBI. Since beginning employment with the FBI, your Affiant has investigated violations of Federal law in various areas including Federal crimes within the District of Wyoming. Your Affiant has attended training provided by the FBI and has received specialized training in conducting criminal investigations.
2. The information contained in this affidavit is based upon information obtained by Affiant and other officers and investigators; your Affiant’s personal knowledge and observations; your Affiant’s training and experience; personal conversations with other law enforcement officers; and review of reports, documents, and other records.
3. Since this affidavit is being submitted for the limited purpose of establishing probable cause to show that YONAIKER ALEXANDER FERNANDEZ PEDRON (FERNANDEZ), YOHANDRI RAMO RAMIREZ GONZALEZ (RAMIREZ), and other unidentified subjects, committed violations of federal law, namely *Bank Robbery*, in violation of 18 U.S.C. § 2113(c), your Affiant has not included each and every fact known concerning this investigation but has set forth only the facts your Affiant believes are necessary for this limited purpose.

**BACKGROUND OF INVESTIGATION**

4. On March 17, 2025, FBI Lander was contacted by Wyoming Division of Criminal Investigation (WYDCI) and informed of a series of Automated Teller Machine (ATM) thefts which occurred on March 15, 2025 and March 16, 2025 in Big Horn County and Hot Springs County, Wyoming, with a total loss of approximately \$54,200 in US currency. The subjects utilized a “jackpotting” technique, which involves illegally accessing the ATM and tampering with, or otherwise

manipulating the software, causing the ATM to dispense money. Keys to open ATMs' access panels are readily available online. Once the access panel is open, the subjects, using devices which can be plugged into the ATMs' USB ports, manipulate the software running the ATMs and disable or bypass the security features of the machines. The subjects are then able to withdraw cash from the ATM at will.

5. On or about March 15, 2025, at approximately midnight, the subjects accessed the drive-through ATM at Big Horn Federal Savings Bank, located at 8 East Main Street, Lovell, Wyoming, and stole approximately \$24,700. Surveillance video from the bank shows the subjects occupying a gray Honda Odyssey van, bearing Colorado license plate CZKD77. Through the assistance of partner law enforcement agencies the driver of the van was identified as FERNANDEZ and one of the other occupants who accessed the ATM was identified as RAMIREZ.
6. On March 16, 2025, at approximately 3:00pm, the subjects illegally accessed a Big Horn Federal Savings Bank ATM located at 33 North 6<sup>th</sup> Street, Greybull, Wyoming, and stole approximately \$19,500 in US currency. FERNANDEZ was again seen in surveillance video to be driving the above Honda Odyssey van while RAMIREZ and an unidentified individual accessed the ATM, manipulating the software, causing the ATM to dispense money.
7. On March 16, 2025, at approximately 7:00pm RAMIREZ and unknown co-conspirators of FERNANDEZ illegally accessed a Big Horn Federal Savings Bank ATM located at 643 Broadway Street, Thermopolis, Wyoming and stole approximately \$10,000 in US currency. The subjects then departed the immediate area in the above Honda Odyssey. During review of surveillance video, one of the known co-conspirators is seen walking away out of camera view. It was believed that FERNANDEZ and others unknown were nearby in another vehicle.

8. During these thefts, FERNANDEZ and RAMIREZ took various roles in the conspiracy to commit theft, to include driving the listed 1999 Honda Odyssey van to the incident locations while co-conspirators accessed the internals of multiple ATMs to place unknown software within which was used to manipulate the ATM into producing US currency without proper authority, or accessed and/or assisted in accessing the internals of multiple ATMs to place unknown software within which was used to manipulate the ATM into producing US currency without proper authority. It was apparent on reviewed video evidence that FERNANDEZ, RAMIREZ and other co-conspirators were acting as drivers, lookouts, software installer, and other roles working as a team to complete the thefts.
9. On March 18, 2025, the 1999 Honda Odyssey van bearing Colorado registration CZKD77 was located on East Jewell Avenue in Denver, Colorado, by assisting Denver Police Department officers and FBI Rocky Mountain Safe Streets Task Force (RMSSTF) members. Law enforcement later located FERNANDEZ and RAMIREZ within an apartment on East Jewell Avenue. FERNANDEZ and RAMIREZ matched the description of subjects captured in surveillance video from the ATM theft incidents.
10. On March 19, 2025, FERNANDEZ and RAMIREZ were arrested in Denver, Colorado, pursuant to Wyoming state arrest warrants related to these thefts. FERNANDEZ and RAMIREZ were subsequently interviewed by FBI SA Gregory Kloepper. After being advised of his Miranda rights, FERNANDEZ identified himself in photos from the ATM surveillance footage from the Lovell ATM theft and admitted to participating in the thefts. FERNANDEZ stated that someone else provided codes and other instructions, through a telephone application, to gain access to the ATMs and prompt the dispensing of cash. RAMIREZ was also advised of his Miranda rights and

identified himself in photos from the Lovell ATM surveillance footage and admitted to participating in the thefts.

11. 8 East Main Street, Lovell, Wyoming, 33 North 6<sup>th</sup> Street, Greybull, Wyoming, and 643 Broadway Street, Thermopolis, Wyoming are located within the District of Wyoming.
12. Big Horn Federal Savings Bank is a Federal Deposit Insurance Corporation (FDIC) insured bank and all three ATMs referenced in this affidavit are owned by Big Horn Federal Savings Bank.

**END OF AFFIDAVIT**